

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

.....X
RICHARD BEHAR,

Plaintiff,

v.

Nos. 17 Civ. 8153(LAK)
18 Civ. 7516(LAK)

U.S. DEPARTMENT OF HOMELAND
SECURITY,

Defendant.

.....X

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the Declarations of Leonza Newsome, III, Kevin L. Tyrrell, and Kim E. Campbell and the accompanying memorandum of law, defendant the U.S. Department of Homeland Security ("DHS"), by its attorney, Geoffrey S. Berman, United States Attorney for the Southern District of New York, will move this Court before the Honorable Lewis A. Kaplan, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order granting summary judgment to defendant DHS in these actions pursuant to Federal Rule of Civil Procedure 56.

Dated: November 5, 2019
New York, New York

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York
Attorney for Defendant DHS

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